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15 Company, Ltd., Pangang Group Steel
16 Vanadium & Titanium Company, Ltd.,
17 Pangang Group Titanium Industry Company,
18 Ltd., and Pangang Group International
19 Economic & Trading Company

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 PANGANG GROUP COMPANY, LTD.;
24 PANGANG GROUP STEEL VANADIUM &
25 TITANIUM COMPANY, LTD.; PANGANG
26 GROUP TITANIUM INDUSTRY
27 COMPANY, LTD; and PANGANG GROUP
28 INTERNATIONAL ECONOMIC &
TRADING COMPANY,

Defendants.

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CASE NO. 4:11-CR-0573-07-10 JSW

**PANGANG DEFENDANTS' NOTICE
OF SUPPLEMENTAL
AUTHORITIES IN SUPPORT OF
THEIR MOTION TO DISMISS
INDICTMENT**

Date: January 4, 2022
Time: 9:30 a.m.
Judge: Hon. Jeffrey S. White
Courtroom: 5, 2nd Floor

The Defendants submit the following supplemental authorities pursuant to the Court's January 12, 2022 Order:

1. Restatement (Second) of Foreign Relations Law § 70 (1965).
 2. Restatement (Fourth) of Foreign Relations Law § 453 reporter's note 1 (2018).
 3. *In re Tamimi*, 176 F.3d 274, 279 (4th Cir. 1999).

Dated: January 13, 2022

**QUINN EMANUEL URQUHART &
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/s/ Robert P. Feldman

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